

<b>Guide for Review of Civil Rights-Related Program Requirements for the State Community Development Block Grant (CDBG) Program</b>			
<b>Name of Program Participant:</b>			
<b>Staff Consulted:</b>			
<b>Name(s) of Reviewer(s):</b>		<b>Date:</b>	

**NOTE:** All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "**finding**."

**Instructions:** This Exhibit is designed to review the State Community Development Block Grant (CDBG) program participant's records on the civil rights-related program requirements (CRRPRs) of the program, including records pertaining to its civil rights-related certifications and the State's oversight of its units of local government's compliance with CRRPRs. The Exhibit is divided into three sections: Analysis of Impediments to Fair Housing Choice; State Record Keeping; and Local Record Keeping. Failure to maintain records is an indication of noncompliance with the State CDBG regulations governing record keeping. While a lack of documentation may not imply discrimination because the State's or unit of local government's data are a basis for further investigating compliance with nondiscrimination requirements, the CPD reviewer is responsible for transmitting this completed Exhibit (along with pertinent support documentation) to FHEO upon conclusion of the monitoring (per Sections 22-3 and 22-4 of the introduction to this Chapter).

**NOTE:** To complete the civil rights-related review of the program participant, this Exhibit is to be completed along with Exhibit 22-6, "Guide for Review of the Civil Rights-Related Program Requirements for Section 504 of the Rehabilitation Act of 1973, as amended," and Exhibit 22-7, "Guide for Review of Section 3 of the Housing and Urban Development Act of 1968."

**Questions:**

**A. ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE**

1.

a. Has the State completed an analysis of impediments to fair housing choice (AI)? [24 CFR 91.325(a)(1)]	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Describe Basis for Conclusion:</b>	

b. If the answer to “a” above is “Yes,” when was the AI completed? (Include date in response below.)	
<b>Describe Basis for Conclusion:</b>	

2.

<b>[OS]</b> Does the State have records regarding its certification to affirmatively further fair housing (AFFH) which include: (a) a completed AI; and (b) information regarding the actions it has taken to address the effects of any impediments identified through the analysis? [24 CFR 91.325(a)(1) and 24 CFR 570.487(b)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	<b>Describe Basis for Conclusion:</b>	

3.

Based on this review, is there evidence that raises questions about the accuracy of the State’s certification to AFFH? (If yes, include in your response below, i.e., actions were inappropriate for identified impediments).	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	<b>Describe Basis for Conclusion:</b>	

B. STATE RECORD KEEPING

4.

<p><b>[OS]</b> For the period reviewed, does the State have records to show that it has reviewed the civil rights performance of its subrecipient units of general local government?                  [24 CFR 570.490(a)]</p>	<p><input type="checkbox"/> <input type="checkbox"/>                  Yes No</p>
<p><b>Describe Basis for Conclusion:</b></p>	

5.

<p><b>[OS]</b> a. During the period reviewed, did the State maintain, for each unit of general local government which received CDBG funds, summary data by activity, on beneficiaries of, individuals participating in, and/or applicants for the program, broken out by:                  (a) race and ethnicity; and                  (b) gender characteristics?                  [ 24 CFR 570.490(a) and 24 CFR 91.520(a) and (b)]</p>	<p><input type="checkbox"/> <input type="checkbox"/>                  Yes No</p>
<p><b>Describe Basis for Conclusion:</b></p>	

<p>b. Are the race and ethnicity data included on Form HUD-27061, "Racial and Ethnic Data Reporting Form?"</p>	<p><input type="checkbox"/> <input type="checkbox"/>                  Yes No</p>
<p><b>Describe Basis for Conclusion:</b></p>	

C. LOCAL RECORD KEEPING

6.

<p><b>[OS]</b> For the period reviewed, did the State document how it requires its funded units of general local government to maintain documentation on their past or planned action(s) to AFFH, including:</p> <p>(a) whether the units of local government have completed their own AIs?</p> <p>(b) whether the units of local government have records documenting their AIs and the actions taken to remedy or ameliorate impediments to fair housing choice in the local government's community?</p> <p>[24 CFR 570.490(b)]</p>	<p><input type="checkbox"/> <input type="checkbox"/></p> <p>Yes No</p>
<p><b>Describe Basis for Conclusion:</b></p>	

7.

<p><b>[OS]</b> For the period reviewed, did the State document how it requires its funded units of general local government to maintain data on the racial, ethnic and gender characteristics of persons who are applicants for, participants in, or beneficiaries of, programs or activities funded in whole or in part with CDBG funds (using Form HUD-27061)?</p> <p>[24 CFR 570.490(b)]</p>	<p><input type="checkbox"/> <input type="checkbox"/></p> <p>Yes No</p>
<p><b>Describe Basis for Conclusion:</b></p>	

D. DISPLACEMENT AND RELOCATION

8.

<p><b>[OS]</b> For the time period reviewed, did the State and any subrecipients reviewed maintain records on households displaced by CDBG-funded activities, which included:</p> <ul style="list-style-type: none"><li>(a) race and ethnicity;</li><li>(b) gender and single heads of households; and</li><li>(c) addresses and census tracts of the housing units to which each displaced household relocated?</li></ul> <p>[24 CFR 570.488]</p>	<table border="1"><tr><td><input type="checkbox"/></td><td><input type="checkbox"/></td></tr><tr><td>Yes</td><td>No</td></tr></table>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No
<input type="checkbox"/>	<input type="checkbox"/>				
Yes	No				
<p><b>Describe Basis for Conclusion:</b></p>					